

**Ex. C**

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January 22, 2016

VIA U.S. MAIL AND LNFS

Matthew D. Thurlow  
Latham & Watkins  
555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 2004-1304

Re: *Orange County Water District v. Unocal Corp., et al.*  
**ConocoPhillips Company's California Public Records Act Request to Irvine Ranch Water District**

Dear Mr. Thurlow:

I am writing in response to your January 7, 2016, California Public Records Act Request to third party Irvine Ranch Water District. We understand that similar requests have been sent to other water purveyors and providers who are members of Orange County Water District.

As you, and your firm, are well aware, discovery in the above matter has been closed for some time, and certain claims are in the process of being remanded to the United States District Court for the Central District of California. It is obvious that your Public Records Act request seeks information that would be covered, controlled, and limited by the discovery rules under the Federal Rules of Civil Procedure, including, but not limited to, Rule 34. These requests seek information, for example, about numerous stations which will be the subject of the upcoming trial. The Suggestion to Remand signed by Judge Scheindlin explicitly states that “[t]he parties have completed all discovery related to the focus sites identified in Exhibit A to Case Management Order #116.” Your public records act request also clearly seeks materials which are privileged and which have been the subject of prior discovery in the above matter.

Since your firm represents defendant ConocoPhillips Company in the above matter, you are obviously aware of these facts. You have, more importantly, failed to provide a copy of your requests to our firm or Orange County Water District, and have not properly served those requests in this matter as required by court orders. Instead, it is clear that you are attempting to

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conduct this discovery without notice to Orange County Water District or our firm in violation of the Federal Rules of Civil Procedure and prior court orders.

We demand that cease and desist all such efforts to conduct improper discovery in the above matter. Please be advised that we intend to raise this matter with Judge Scheindlin at the upcoming status conference (or sooner if necessary), and will seek all appropriate and available remedies to address this improper attempt to conduct discovery in violation of the Suggestion to Remand and other court orders.

We also hereby demand a copy of all such letters sent to other third parties by the close of business on Monday, January 25, 2016.

Sincerely,

  
Tracey L. O'Reilly

cc: All Counsel (via LNFS)

Jon D. Anderson (via Email)